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Attorneys for Defendant/Counterclaimant  
MICHAEL RAY TRISLER

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAI‘I

JASON RAY CLARK,

Plaintiff/Counterclaim  
Defendant,

v.

MICHAEL RAY TRISLER,

Defendant/  
Counterclaimant.

Case No. 22-cv-00559-JAO-KJM

**DEFENDANT/  
COUNTERCLAIMANT MICHAEL  
RAY TRISLER’S CONCISE  
STATEMENT OF FACTS IN  
SUPPORT OF MOTION FOR  
SUMMARY JUDGMENT;  
DECLARATION OF LAURA P.  
MORITZ; DECLARATION OF  
MICHAEL R. TRISLER;  
DECLARATION OF HOMER  
BUSTER ALTINE III; EXHIBITS “A”  
– “C”; CERTIFICATE OF WORD  
COUNT**

Judge: Hon. Jill A. Otake  
Trial Date: January 21, 2025

**DEFENDANT/COUNTERCLAIMANT MICHAEL RAY TRISLER'S  
CONCISE STATEMENT OF FACTS IN SUPPORT OF MOTION FOR  
SUMMARY JUDGMENT**

Defendant and Counterclaimant Michael Ray Trisler (“**Mr. Trisler**”), through his attorneys, Dentons US LLP, submits this Separate Concise Statement of Facts in support of his concurrently-filed Motion for Summary Judgment.

	<b>Material Fact</b>	<b>Citation</b>
1.	In or around September 2021, Counterclaim Defendant Jason Ray Clark (“Clark”) began sending letters to organizations associated with Mr. Trisler’s professional work, local (Hawai`i) businesses associations, and Mr. Trisler’s family, friends, acquaintances.	Moritz Decl., ¶¶ 1 – 2, Moritz Decl., Ex. A (Requests, deemed admitted); <i>id.</i> , Ex. A at Exhibits 1 (Clark’s letter) and 2 (list of recipients of Clark’s letter).
2.	Mr. Trisler repaid the Luibuenos loan to Clark in increments in July, August, and September 2018.	Trisler Decl., ¶ 7.
3.	Mr. Trisler ultimately paid Clark additional money in connection with the Luibuenos loan, not because he believed he owed Clark the additional money, but in hopes of avoiding further contact with Clark.	Trisler Decl., ¶ 9.
4.	Even after Mr. Trisler repaid the loan and paid additional amounts, Clark continued to send the same letters stating that Mr. Trisler is a liar, swindler, deadbeat, fraudster, and con man, defining deadbeat as one who doesn’t pay debts.	Declaration of Homer Buster Altine III, ¶ 2.

DATED: Honolulu, Hawai‘i, August 26, 2024.

/s/ Laura P. Moritz

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